

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF VERMONT

UNITED STATES OF AMERICA,)
)
)
v.) Docket No. 5:18-cr-61
)
)
SAM BENT and DJENEBA BENT,)
Defendants.)

**STIPULATED MOTION FOR ONE WEEK EXTENSION
TO RESPOND TO MOTION TO SUPPRESS**

The United States of America requests a one-week extension to respond to the pending motion to suppress (document 22) filed by defendant Sam Bent and related to which Djeneba Bent has filed a motion to join (doc. 24). The Government's response is due Tuesday, February 19, but the undersigned requests an additional week. The motion is 20 pages, nearly single-spaced, and raises at least six discrete issues, some of which are novel. The requested extension will enable the undersigned to prepare an opposition that should facilitate the fair and just resolution of the potentially serious issues raised by the motion.

Defendants will not be prejudiced by the granting of this motion. Neither is in custody, and this Court granted three motions to extend the time for Defendants to prepare motions (docs. 17, 19, & 21). Counsel for defendants David McColgin and Stephanie Greenlees have advised they agree to the granting of this motion for an extension of time.

Accordingly, the United States requests its deadline for responding to the pending motions be extended to Tuesday, February 26, 2019.

Respectfully submitted, this 14th day of February, 2019.

UNITED STATES OF
AMERICA

CHRISTINA NOLAN
United States Attorney

By: /s/ *Michael P. Drescher*
Michael P. Drescher
Assistant U.S. Attorney
P.O. Box 570
Burlington, VT 05402-0570
(802) 951-6725
Michael.Drescher@usdoj.gov

Certificate of Service

I, Michael Drescher, certify that I filed the above document via the Court's electronic case filing system, thereby causing it to be served on counsel for defendants electronically.

/s/ Michael P. Drescher_____